

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

**LATOYA BROWN; LAWRENCE BLACKMON
HERBERT ANTHONY GREEN; KHADAFY MANNING;
QUINETTA MANNING; MARVIN MCFIELD; NICHOLAS
SINGLETON; STEVEN SMITH; BESSIE THOMAS; and
BETTY JEAN WILLIAMS TUCKER, individually and on
behalf of a class of all other similarly situated,**

PLAINTIFFS

v.

CIVIL ACTION NO. 3:17-cv-347 WHB LRA

**MADISON COUNTY, MISSISSIPPI; SHERIFF
RANDALL C. TUCKER, in his official capacity; and;
MADISON COUNTY SHERIFF'S DEPUTIES JOHN
DOES #1 through #6, in their individual capacities,**

DEFENDANTS

**RESPONSE BY TOBY TROWBRIDGE TO DOCUMENT REQUESTS
IN SUBPOENA TO TESTIFY [DOC. 175]**

1. All documents concerning the MCSD, including, but not limited to, documents concerning, created, and/or prepared during any and all time periods in which you were employed by the MCSD as Sheriff and/or in any supervisory role. This request includes: (i) all documents concerning complaints made to you, the MCSD, any MCSD personnel, and/or the Board of Supervisors concerning any aspects of the MCSD's policing practices during any and all time periods in which you were employed by the MCSD as Sheriff and/or in any supervisory role; and (ii) all documents concerning any written or unwritten MCSD policy that you established, drafted, created, implemented, and/or enforced during any and all time periods in which you were employed by the MCSD as Sheriff and/or in any supervisory role.

Response: Mr. Trowbridge has no documents. He left all documents with the Sheriff's department at the end of his term of service.

2. All documents concerning any communications with Randall Tucker and/or other MCSD personnel regarding the MCSD or policing in Madison County, irrespective of whether any such communication took place during or after your employment with the MCSD.

Response: Mr. Trowbridge has no documents. He left all documents with the Sheriff's department at the end of his term of service.

3. All documents concerning any interactions, meetings, and/or direct or indirect communications with the Board of Supervisors and/or any individual supervisor regarding the MCSD or policing in Madison County, irrespective of whether any such communication took place during or after your employment with the MCSD.

Response: Mr. Trowbridge has no documents. He left all documents with the Sheriff's department at the end of his term of service.

This the 12th day of February, 2018.

Respectfully submitted,

TOBY TROWBRIDGE

By: WATKINS & EAGER PLLC

/s/ Robert H. Pedersen

Robert H. Pedersen

OF COUNSEL:

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CERTIFICATE OF SERVICE

I, Robert H. Pedersen, do hereby certify that I electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to the following:

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This the 12th day of February, 2018.

/s/ Robert H. Pedersen

Robert H. Pedersen